

FILED

Carmen M. Manzaneda,
Plaintiff in Propria Persona
2268 Wheelwright Court
Reston, Virginia 20191

571-334-0275 UNITED STATES DISTRICT COURT

2018 JAN 10 P 1:03

DISTRICT OF VIRGINIA

CLERK US DISTRICT COURT
ALEXANDRIA, VIRGINIA

CARMEN M. MANZANEDA

PLAINTIFF

v.

CASE NO. 1:18-CV-00040
(TSE/JFA)

AIDA DUENAS AND JOSEPH LUIS ROSARIO

DEFENDANTS

COUNT I – ~~PETITION~~ TO PERPETUATE TESTIMONY
COMPLAINT

Comes now the plaintiff Carmen M. Manzaneda and sues the defendant AIDA DUENAS to perpetuate testimony.

JURISDICTION

This court has jurisdiction under Rule 27 of the Federal Rules of Civil Procedure.

VENUE

Plaintiff resides in Virginia and receives mail at the address of 2268 Wheelwright Court, Reston, Virginia, and has resided here for all times material to this complaint. Defendant resides in the State of California, Ventura County, and her address upon which service of process can be made is Shapiro & Burson, LLP, 13135 Lee Jackson Highway, Suite 201, Fairfax, Virginia 22033.

ALLEGATIONS

The petitioner expects to be a party to an action cognizable in a United States court but cannot presently bring it or cause it to be brought.

The subject matter of the expected action and the petitioner's interest.

The facts that the petitioner wants to establish by the proposed testimony and the reasons to perpetuate it include the following:

a. The defendant made false statements and representations about the lien against the title to plaintiff's property so that it could be taken in a foreclosure; however, the

foreclosing party has never acquired any legal rights, including servicing rights, or any interest in the petitioner's title to her home, or the note and trust deed that was recorded against the title.

b. The defendant is involved with the theft of the petitioner's identifying, banking, financial and credit information for their own profit.

c. The defendant is using the state and county foreclosure process to launder counterfeit and forged instruments.

The names or a description of the persons whom the petitioner expects to be adverse parties and their addresses, so far as known; and the name, address, and expected substance of the testimony of each deponent are as follows:

a. Aida Duenas, to testify about the transfer and assignment of the trusteeship from the original trustee, and the assignment of the note and trust deed.

b. Joseph Luis Rosario, to testify about the transfer and assignment of the note and trust deed and related records.

Perpetuating the testimony may prevent a failure or delay of justice.

WHEREFORE Petitioner requests an order authorizing the petitioner to depose the named persons in order to perpetuate their testimony.

COUNT II – PETITION TO PERPETUATE TESTIMONY

Comes now the plaintiff Carmen Manzaneda and sues the defendant JOSEPH LUIS ROSARIO to perpetuate testimony.

JURISDICTION

This court has jurisdiction under Rule 27 of the Federal Rules of Civil Procedure.

VENUE

Plaintiff resides in Virginia and receives mail at the address of 2268 Wheelwright Court, Reston, Virginia, and has resided here for all times material to this complaint. Defendant resides in the State of Florida, Hillsborough County, and the address upon which service of process can be made is Seterus, Inc., 14523 SW Millikan Way #200, Beaverton, OR 97005.

ALLEGATIONS

The petitioner expects to be a party to an action cognizable in a United States court but cannot presently bring it or cause it to be brought.

The subject matter of the expected action and the petitioner's interest.

The facts that the petitioner wants to establish by the proposed testimony and the reasons to perpetuate it include the following:

a. The defendant made false statements and representations about the lien against the title to plaintiff's property so that it could be taken in a foreclosure; however, the foreclosing party has never acquired any legal rights, including servicing rights, or any interest in the petitioner's title to her home, or the note and trust deed that was recorded against the title.

b. The defendant is involved with the theft of the petitioner's identifying, banking, financial and credit information for their own profit.

c. The defendant is using the state and county foreclosure process to launder counterfeit and forged instruments.

The names or a description of the persons whom the petitioner expects to be adverse parties and their addresses, so far as known; and the name, address, and expected substance of the testimony of each deponent are as follows:

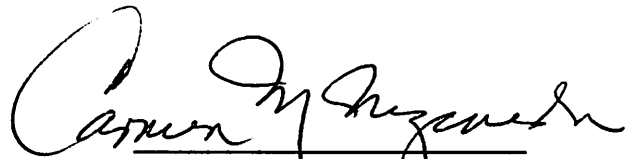
a. Aida Duenas, to testify about records related to the debt collections against the plaintiff and the transfer and assignment of the trusteeship from the original trustee, and the assignment of the note and trust deed.

b. Joseph Luis Rosario, to testify about records related to the debt collections against the plaintiff and the transfer and assignment of the trusteeship from the original trustee, and the assignment of the note and trust deed.

Perpetuating the testimony may prevent a failure or delay of justice.

WHEREFORE Petitioner requests an order authorizing the petitioner to depose the named persons in order to perpetuate their testimony.

DATED this 19th day of December, 2017.


Carmen M. Manzaneda,
Plaintiff in Propria Persona

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

CARMEN M. MANZANEDA

Plaintiff(s),

v.

Civil Action Number: 1:18-CV-40

AIDA DUEÑAS AND JOSEPH LUIS ROSARIO

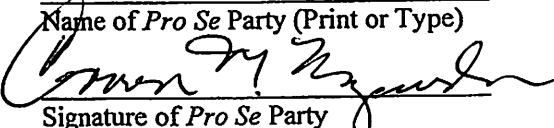
Defendant(s).

LOCAL RULE 83.1(M) CERTIFICATION

I declare under penalty of perjury that:

No attorney has prepared, or assisted in the preparation of COMPLAINT TO PERPETRATE TESTIMONY,
(Title of Document)

CARMEN M. MANZANEDA
Name of Pro Se Party (Print or Type)


Signature of Pro Se Party

Executed on: 10 JAN 18 (Date)

OR

The following attorney(s) prepared or assisted me in preparation of _____.
(Title of Document)

(Name of Attorney)

(Address of Attorney)

(Telephone Number of Attorney)

Prepared, or assisted in the preparation of, this document

(Name of Pro Se Party (Print or Type)

Signature of Pro Se Party

Executed on: _____ (Date)